UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION II



26 Federal Plaza New York, NY 10278

AIR AND WASTE MANAGEMENT DIVISION

FACSIMILE REQUEST AND COVER SHEET	
**** PLEASE PRINT	TIN BLACK INK ONLY ****
To: James Colter	Office: () < Mayor
Phone: (215) 595-056	7 Fax Na. (215) 595-0555 Confirm Na.
From: Carol Stein	
Phone: (212) 264-5130	Fax No. FT8: 264- 6155 Commer: (212) 264- 6155
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Date: 9/13/93	NUMBER OF PAGES TO INCLUDE

MESSAGES

**** PLEASE NUMBER ALL PAGES *****

JinAs we discussed, attacked are the comments from
EPA on the draft Phase 2 RCRA Facility
Investigation report for Gramman-Bethpage.

NYSDEC sent its comments separately this time.

Clair Stein

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SEP 9 1993

Mr. John Middelkoop
Chief, Bureau of Eastern Hazardous
Waste Programs
Division of Hazardous Substances Regulation
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233-0001

Re: Grumman Aerospace Corporation - Bethpage Resource Conservation and Recovery Act EPA I.D. No.: NYD002047969

Dear Mr. Middelkoop:

We have reviewed the draft Phase 2 RCRA Facility Investigation (RFI) for the Grumman Aerospace Corporation facility, located in Bethpage, New York. The RFI appears to be acceptable, provided that the following is acknowledged by the Navy:

Recharge Basins

- 1- Section 4.7.3 (p. 4-45) of the report notes that off-site groundwater contamination at intermediate depths is probably due to recharge basin water. However, the section of the report on the recharge basins investigation does not address this connection. The Navy should select a remedy which thoroughly addresses contamination which may have migrated from the recharge basins.
- 2- Section 1.4.3 (p. 1-9) of the report states that "since the concentration of volatile organics in the surface water was lower than in the production wells, the system likely resulted in partial treatment of the groundwater by volatilization." The words "partial treatment" are not acceptable because transfer of contamination from one medium to another (in this case from water to air) without any monitoring or control of emissions, should not be considered a treatment method.

3- In a September 1, 1993 telephone conversation between Ms. Carol Stein of my staff and Mr. James Colter of the U.S. Navy, Mr. Colter said that in reference to the former drum marshalling area (site #1), it is not critical for the sources of contamination to be determined for this area as long as all the contamination in the area is remediated. Mr. Colter stated that the entire site #1 will be remediated regardless of whether the source of contamination can be determined. We agree with this approach provided that diligent effort will be taken by the Navy in determining that the area is thoroughly remediated. Please transmit these comments to the U.S. Navy along with any additional comments which you may have. Please also ensure that the comment letter is jointly signed by EPA and NYSDEC. If you should have any questions, Ms. Carol Stein, of my staff, can be contacted at (212) 264-5130.

Sincerely yours,

Andrew Bellina, P.E. Chief, Hazardous Waste Facilities Branch

cc: Dennis Lucia, NYSDEC Kelly Bologna, NYSDEC

bcc: J. Reidy, 2AWM-HWF C. Stein, 2AWM-HWF₁/